

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

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BLACK LOVE RESISTS IN THE RUST by and through MARIELLE SHAVONNE SMITH and CHARIS HUMPHREY on behalf of its members; SHAKETA REDDEN; DORETHEA FRANKLIN; TANQUA SIMMONS; DE'JON HALL; JOSEPH BONDS; CHARLES PALMER; SHIRLEY SARMIENTO; EBONY YELDON; and JANE DOE, individually and on behalf of a class of all others similarly situated;

Plaintiffs,

v.

Civil No.: 1:18-cv-00719-CCR

CITY OF BUFFALO, NY; BYRON B. BROWN, Mayor of the City of Buffalo, in his individual and official capacities; BYRON C. LOCKWOOD, Commissioner of the Buffalo Police Department, in his individual and official capacities; DANIEL DERENDA, former Commissioner of the Buffalo Police Department, in his individual capacity; AARON YOUNG, KEVIN BRINKWORTH, PHILIP SERAFINI, ROBBIN THOMAS, UNKNOWN SUPERVISORY PERSONNEL 1-10, UNKNOWN OFFICERS 1-20, each officers of the Buffalo Police Department, in their individual capacities.

Defendants.

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**CONSENT MOTION FOR ADJOURNMENT  
OF COURT-ORDERED DEADLINES**

The City respectfully moves to amend the scheduling order to extend the dispositive motion deadline from December 4, 2024 to January 30, 2025. The City further moves to change the deadline for the City to respond to Plaintiffs' supplemental class

certification briefing from December 3, 2024 to December 6, 2024. Plaintiffs consent to the requested extensions.

In support of this motion, the City states as follows:

1. Under the present case management order, the deadline to file dispositive motions is December 4, 2024.

2. On October 23, 2024, the Court heard oral argument from the Parties regarding Plaintiffs' motion for class certification. At oral argument, the Court gave Plaintiffs the opportunity to submit supplemental briefing in further support of their motion for class certification. The Court also granted the City the ability to respond within two weeks of Plaintiffs' supplemental submission.

3. Plaintiffs filed their supplemental briefing in further support of their motion for class certification on November 19, 2024. Per the Court's direction, the City's current deadline to respond to Plaintiffs' supplemental briefing is December 3, 2024.

4. In light of the City's competing deadlines and the upcoming holidays, the City respectfully requests, with Plaintiffs' consent, that the dispositive motion deadline be extended from December 4, 2024 to January 30, 2025 and that the deadline for the City's response to Plaintiffs' supplemental briefing be extended from December 3, 2024 to December 6, 2024.

5. The Parties thank the Court in advance for its consideration of this request.

Dated: Buffalo, New York  
November 21, 2024

/s/ Peter A. Sahasrabudhe

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*Attorneys for Defendants*

**CERTIFICATE OF SERVICE**

I hereby certify that on November 21, 2024, the above Stipulation Motion for Adjournment of Court-Ordered Deadlines was filed with the Clerk of the Court and served in accordance with the Federal Rules of Civil Procedure, and/or the Western District's Local Rules, and/or the Western District's Case Filing Rules & Instructions upon all counsel registered through the ECF System.

/s/ Peter A. Sahasrabudhe

Peter A. Sahasrabudhe